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**ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)  
COMPLIANCE EVALUATION INSPECTION (CEI) REPORT**

**1) AUTHOR OF REPORT**

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**2) FACILITY INFORMATION**

Chemical Waste Management, Inc. (CWM)  
36964 Alabama Highway 17 North  
Emelle (Sumter County), Alabama 35459

EPA Identification Number: ALD000622464  
NAICS Code(s): 562211  
Website: [HYPERLINK "http://www.wm.com/index.jsp"]

**3) RESPONSIBLE OFFICIAL(S)**

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**4) INSPECTION PARTICIPANT(S)**

Mr. Mike Davis, Senior District Manager – CWM  
Mr. Robert Kronable, Environmental Manager – CWM  
Mr. Nelson Sturdivant, Operations Manager – CWM  
Mr. Al Talbott, Safety Manager – CWM  
Mr. Guy Cogle, Laboratory Manager – CWM  
Mr. David Kendrick, Senior Chemist – CWM  
Mr. Byron Spiller, Senior Chemist – CWM  
Mr. Keon Little, Chemist – CWM  
Mr. Kent Jones, Stabilization Supervisor / Tank Farm Technician – CWM  
Mr. Fayette Campbell, Control Room Operator – CWM  
Mr. Mark West, Drum Processing Supervisor – CWM  
Mr. Dewayne Speight, Environmental Technician – CWM  
Ms. Lisa Acker, Approvals Chemist – CWM  
Mr. John Burke, Shop Supervisor – Robbie D. Wood, Inc.  
Ms. Paula Whiting, Environmental Engineer – U.S. Environmental Protection Agency  
Ms. Kimberly Chavez, Environmental Protection Specialist – U.S. Environmental Protection Agency  
Mr. Clethes Stallworth, Chief of the Compliance and Enforcement Section – ADEM  
Mr. Michael Cruise, Environmental Scientist Sr. – ADEM  
Ms. Blake Pruitt, Environmental Scientist Sr. – ADEM  
Ms. L. J. Knickerbocker, Environmental Scientist Sr. – ADEM  
Mr. Jonah Harris, Environmental Scientist Sr. – ADEM

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Ms. Dee Dee Canionero, Environmental Scientist – ADEM  
Ms. Bailee Dykes, Environmental Scientist – ADEM  
Mr. Clay Messer, Environmental Engineer Sr. – ADEM

5) DATE OF INSPECTION

November 17, 2015 through November 20, 2015

6) APPLICABLE REGULATIONS

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

7) PURPOSE OF INSPECTION

The purpose of the inspection was to determine CWM's compliance with its Hazardous Waste Facility Permit and all applicable standards of Division 14 of the ADEM Administrative Code.

8) FACILITY DESCRIPTION

CWM is a permitted commercial hazardous waste storage, treatment, and disposal facility. The facility occupies approximately 650 acres and includes one active hazardous waste landfill, sixteen closed hazardous waste landfills (which are currently undergoing permitted post-closure care), a hazardous waste treatment operation, several storage areas for hazardous wastes and PCB-contaminated materials, and various ancillary operations (facility maintenance areas, leachate storage tanks, a waste sampling area, an on-site laboratory, etc.). For a detailed description of the facility's hazardous waste management operations, see the Hazardous Waste Inspection Report dated November 29, 2010.

CWM has been in operation at its current location since 1976. The facility currently employs 51 people. CWM's typical hours of operation are between 7:00 am and 3:30 pm on weekdays. In its most recent notification of regulated waste activity (ADEM Form 8700-12), which was received by the Department on February 17, 2015, CWM identified itself as a permitted treatment, storage, and disposal facility; a large quantity generator of hazardous waste; a used oil generator; a transporter of hazardous waste, used oil, and universal waste; a transfer facility for both hazardous waste and used oil; and a large quantity handler of universal waste. The Department is currently working with CWM to renew its Hazardous Waste Facility Permit, which expired on September 15, 2015.

9) OBSERVATIONS

At approximately 9:15 a.m. on November 17, 2015, representatives of the U.S. Environmental Protection Agency (Ms. Whiting and Ms. Chavez) and representatives of the Department (Ms. Knickerbocker, Ms. Canionero, Ms. Dykes, and Mr. Harris) arrived at the facility and met with representatives of CWM (Mr. Davis, Mr. Kronable, Mr. Sturdivant, and Mr. Talbot). At that time, the inspection participants identified themselves, discussed the purpose of the inspection, and reviewed applicable safety precautions. Following this opening conference, the inspection participants broke into two groups to begin the inspection. Ms. Knickerbocker conducted a thorough review of CWM's hazardous waste management records. Mr. Stallworth, Mr. Messer, Mr. Cruise, and Ms. Pruitt subsequently arrived at the facility and joined the record review team. Ms. Whiting, Ms. Chavez, Ms. Canionero, Ms. Dykes, and Mr. Harris conducted a walk-through inspection of the facility. The following areas were inspected on November 17, 2015:

A) Trench 22 – Active Landfill (Hazardous Waste Disposal Unit)

CWM currently operates one permitted hazardous waste landfill (Trench 22), which is located near the

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facility's southern border. Trench 22 has a total capacity of 5,259,358 cubic yards.

Mr. Sturdivant accompanied the inspectors into the trench. An alpha-numeric grid was displayed along the trench's perimeter. One cardboard box containing personal protective equipment (PPE) contaminated with hazardous waste was observed in section P-Q, 10-11 (at elevation level 4). Waste machinery (a discarded hydraulic press) was observed in section O-P, 10-11 (at elevation level 4). One macroencapsulation vault containing hazardous wastes was observed in section M-N, 9-10 (at elevation level 5). These observations were relayed to Ms. Knickerbocker, who used them to verify the accuracy of CWM's waste tracking system.

**B) Building 1400 – Tank Farm (Hazardous Waste Storage Unit)**

Building 1400 consists of sixteen hazardous waste storage tanks (Tank 1405, Tank 1406, Tank 1407, Tank 1408, Tank 1409, Tank 1410, Tank 1411, Tank 1412, Tank 1413, Tank 1414, Tank 1415, Tank 1416, Tank 1417, Tank 1418, Tank 1419, and Tank 1420) constructed on a concrete secondary containment system. Four of these tanks have a capacity of approximately 500,000 gallons; the remaining twelve tanks have a capacity of approximately 250,000 gallons. The containment system—a concrete pad surrounded by short concrete walls—is coated with a chemical-resistant polymer. A loading / unloading area for tanker trucks is located adjacent to the tank farm. The loading / unloading area consists of a corrugated metal roof suspended over a bermed concrete pad. Both the concrete pad and the concrete berms are coated with a chemical-resistant polymer.

**Commented [cs1]:** Is this "combined capacity" or the capacity of each tank?

Mr. Sturdivant and Mr. Jones accompanied the inspectors to the tank farm. Signs bearing the words "Watch Out For Slick Spots" and "Authorized Personnel Only" were posted at the perimeter of the tank farm (see Photograph #1 in the attached photo log). Some of these signs were faded and nearly illegible. All sixteen tanks appeared to be in good condition. Each was labeled with the words "Hazardous Waste" (see Photograph #2). Several chips / cracks in the containment system's chemical-resistant coating were noted (see Photograph #3).

One open-top metal 55-gallon drum (a satellite accumulation container holding contaminated PPE) was staged near the loading / unloading area (see Photograph #4). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the following words: "Contaminated PPE Only", "Caution – Contains PCBs", "Hazardous Waste", "Waste Mgm (Site Generated Waste)", "000684", and "D004-11" (see Photograph #5 and Photograph #6). The drum appeared to be full. It was not marked with an accumulation start date.

The inspection participants returned the following day to continue the inspection. The following areas were inspected on November 18, 2015:

**C) Building 708 - Laboratory (Satellite Accumulation Area)**

CWM's on-site laboratory is divided into four rooms: a wet chemistry lab, a sample storage room, an inorganic lab, and an organic prep lab. Confirmatory testing (analysis of wastes received by CWM to verify the accuracy of the waste profile and assign a management method to the wastes) and post-treatment testing (analysis of wastes that have been stabilized on-site to verify that they have been sufficiently treated to meet applicable land disposal restrictions) are performed in the laboratory. Once testing is complete, the samples are returned to their original containers. The tops of these containers are marked with the applicable identifying codes (management method code, profile number, etc.). These containers are sorted by compatibility and placed in the sample storage room prior to being placed in lab packs and disposed in CWM's on-site landfill.

Mr. Cogle, Mr. Kendrick, and Mr. Little accompanied the inspectors to the laboratory. The floors throughout the laboratory were coated with a chemical-resistant polymer. Floor drains were located throughout the laboratory. According to Mr. Cogle, these drains lead to a collection sump connected to a hazardous waste storage tank.

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Five 30-gallon metal step cans (satellite accumulation containers holding cups, vials, and other lab wastes) were staged in the wet chemistry lab (see Photograph #7). Each of these containers was closed (they were equipped with spring-loaded lids) and labeled with the words "Caution – Contains PCBs", "Hazardous Waste", and "Lab Trash" (see Photograph #8 through Photograph #12). Four 10-gallon plastic carboy containers (satellite accumulation containers holding liquid lab wastes) were staged under fume hoods in the wet chemistry lab (see Photograph #13). Each of these containers was closed and labeled with the words "Caution – Contains PCBs" and "Hazardous Waste". One plastic 5-gallon bucket (a satellite accumulation container holding broken glassware) was staged on the floor in the wet chemistry lab (see Photograph #14). It was closed and labeled with the words "Caution – Contains PCBs" and "Hazardous Waste". Two open-top metal 55-gallon drums (satellite accumulation containers holding liquid lab wastes) were staged underneath a walk-in fume hood in the back of the wet chemistry lab (see Photograph #15 and Photograph #16). One of the drums held PCB-contaminated wastes (according to Mr. Coglin, these wastes will be shipped off-site to be incinerated). The drum was closed, labeled with the words "Caution – Contains PCBs" and "Hazardous Waste", and dated November 2, 2015 (see Photograph #17). The other drum held laboratory wastes that did not contain PCBs (according to Mr. Coglin, these wastes will be solidified and disposed on-site in CWM's landfill). The drum was closed (a metal funnel with a valve was screwed into its bung hole) and labeled with the words "Hazardous Waste", "Corrosive", and "TCLP Extraction Waste" (see Photograph #18). The drum was dated October 2, 2015.

Ten metal shelves located in the sample storage room held sample containers of various sizes (glass 1-ounce jars, plastic 1-gallon buckets, plastic 5-gallon buckets, etc.). According to Mr. Coglin, samples may be stored in this area for up to three months. Each sample container was closed and clearly labeled (either with the words "Caution – Contains PCBs", "Hazardous Waste", or other words that describe its contents) (see Photograph #19 through Photograph #21).

The inorganic lab was divided into two sections: a "clean side" and a "dirty side". One 30-gallon metal step can (a satellite accumulation container holding lab wastes) was staged in the clean side of the inorganic lab. It was closed and labeled with the words "Caution – Contains PCBs", "Hazardous Waste", and "Lab Trash". A 5-gallon metal step can (a satellite accumulation container holding lab wastes) was also staged in the clean side (see Photograph #22). It was closed and labeled with the words "Caution – Contains PCBs", "Hazardous Waste", and "Empty Daily". Two Thermo-ICP machines were located in the clean side. Each of these machines was connected (via plastic tubing) to a plastic 5-gallon jug. The jug connected to the smaller / newer Thermo-ICP machine was closed and labeled with the words "Caution – Contains PCBs", "Hazardous Waste", and "Corrosive" (see Photograph #23). It was dated October 5, 2015. The jug connected to the larger / older Thermo-ICP machine was closed and labeled with the words "Caution – Contains PCBs" and "Hazardous Waste" (see Photograph #24). It was dated March 25, 2015. One mercury analysis machine was located in the clean side. It was connected (via a plastic tube) to a plastic 1-gallon jug. The jug was closed and labeled with the words "Caution – Contains PCBs", "Hazardous Waste", and "Corrosive" (see Photograph #25). It was dated November 6, 2015. One 30-gallon metal step can and one 5-gallon metal step can (satellite accumulation containers holding lab wastes) were staged in the dirty side of the inorganic lab. Both containers were closed and labeled with the words "Caution – Contains PCBs", "Hazardous Waste", and "Lab Trash".

One 30-gallon metal step can (a satellite accumulation container holding lab wastes) was staged in the organic lab. It was closed and labeled with the words "Caution – Contains PCBs", "Hazardous Waste", and "Lab Trash" (see Photograph #26).

#### D) Building 1200A – Stabilization Building (Hazardous Waste Treatment Unit)

Building 1200A is a corrugated metal building where permitted treatment of hazardous wastes takes place. The building houses two stainless steel-lined vats (Vat 1 and Vat 2) in which hazardous wastes are mixed with stabilizing agents (ferrous sulfide, lime kiln dust, etc.) prior to being disposed on-site. Each vat is equipped with a separate / independent dust control system. The dust collection silos associated with those

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dust control systems are located in separate rooms within the building.

Mr. Jones and Mr. Campbell escorted the inspectors to the stabilization control room, where they observed a load of hazardous waste (profile #A97363 – sludge bearing the waste codes D005 and D011) being off-loaded into Vat 2, stabilized, sampled, and then loaded into a roll-off container (see Photograph #27 through Photograph #38). The roll-off container was subsequently transported to Building 2200, where it will be staged until post-treatment analysis is completed. The sample was split in CWM's laboratory by Mr. Spiller (a portion of the sample was retained by CWM to be analyzed in its on-site laboratory and a portion of the sample was transported to ADEM's laboratory in Montgomery). According to Mr. Jones, the floors within Building 1200-A are rinsed with water at least daily. Rinse water generated in this manner drains into the two treatment vats and is subsequently used as makeup water in the stabilization process.

Mr. Sturdivant escorted the inspectors to the dust control silos associated with CWM's treatment process. The dust control silo associated with Vat 1 was located on the west side of Building 1200-A. Signs bearing the words "Danger – Unauthorized Personnel Keep Out", "Caution – High Noise Area – Hearing Protection Required", and "Caution – Contains PCBs" were posted on the door leading to the silo (see Photograph #39). One roll-off container was staged underneath the dust control silo at the time of the inspection. The container was labeled with the words "APCS Dust 1" and "Hazardous Waste" (see Photograph #40 and Photograph #41). It was marked with an accumulation start date of October 10, 2015.

The dust control silo associated with Vat 2 was located on the east side of Building 1200-A. Signs bearing the words "Danger – Unauthorized Personnel Keep Out", "Caution – High Noise Area – Hearing Protection Required", and "Caution – Contains PCBs" were posted on the door leading to the silo (see Photograph #42). One roll-off container was staged underneath the dust control silo at the time of the inspection. The container was labeled with the words "APCS Dust 3" and "Hazardous Waste" (see Photograph #43 and Photograph #44). It was marked with an accumulation start date of October 10, 2015.

E) Building 2200 – Bulk Container Storage Area (Hazardous Waste Storage Unit)

Building 2200 is an open-sided corrugated metal building where containers of hazardous waste and PCB-contaminated materials are stored prior to being disposed in CWM's landfill. The building has a maximum capacity of 105 roll-off containers. The concrete base that underlies the portion of the building where hazardous wastes are stored is coated with a chemical-resistant polymer. Rubber matting has been bolted to the concrete floor underneath the portion of the building where PCB-contaminated materials are stored.

Mr. Sturdivant escorted the inspectors to Building 2200. The following containers were staged in Building 2200 at the time of the inspection: 92 roll-off containers of waste, thirteen super sacks of absorbent material (product used in CWM's stabilization process), 22 pallets of granular ferric sulfate (product used in CWM's stabilization process), and two metal 55-gallon drums (satellite accumulation containers holding used PPE). Each roll-off container holding hazardous waste was closed / covered and labeled with the words "Hazardous Waste" and the appropriate waste codes. All but one of these containers were marked with accumulation start dates. Container #RO-24 was labeled with an accumulation start date of "15" (see Photograph #45 and Photograph #46). Mr. Sturdivant provided the inspectors with documentation indicating that container #RO-24 was filled and moved to Building 2200 on November 12, 2015. The labels on two roll-off containers (container #6014 and container #965) were not visible because the containers were staged too close to the surrounding containers (see Photograph #47 and Photograph #48). The satellite accumulation containers staged in Building 2200 were closed (they were equipped with domed metal lids with spring-loaded openings) and labeled with the following words: "Contaminated PPE Only", "Caution – Contains PCBs", "Hazardous Waste", "Waste Mgm (Site Generated Waste)", "000684", and "D004-11" (see Photograph #49). The secondary containment system underlying the containers appeared to be in good condition.

F) Building 606 – Facility Maintenance Shop (Satellite Accumulation Area)

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Building 606 currently houses CWM's general maintenance shop (which serves as the base of operations for maintenance activities performed on the facility's buildings, structures, and stationary equipment).

Mr. Sturdivant escorted the inspectors to Building 606. One 30-gallon metal step can (a satellite accumulation container holding waste aerosol cans) was staged next an air compressor behind Building 606. The container was closed (it was equipped with a spring-loaded lid) and labeled with the words "Hazardous Waste".

G) Building 300 – Heavy Equipment Maintenance Shop (Satellite Accumulation Area)

Building 300 houses CWM's heavy equipment maintenance shop—a corrugated metal garage in which maintenance is performed on the facility's heavy equipment (trucks, excavators, etc.). Used oil generated in the shop is collected in small transfer containers (metal 20-gallon drums with wheels and removable lids, metal 35-gallon drums with wheels and funnels, etc.). The contents of these containers are pumped directly into a used oil storage tank located outside, behind Building 300.

Mr. Sturdivant escorted the inspectors to Building 300. One parts washer was located in the shop. One 30-gallon metal step can (a satellite accumulation container holding waste aerosol cans) was staged in the shop at the time of the inspection. The container was closed (it was equipped with a spring-loaded lid) and labeled with the words "Hazardous Waste". The step can appeared to be full (see Photograph #50). One open-top metal 55-gallon drum (a satellite accumulation container holding used oil / fuel filters) was staged in the garage. It was closed and labeled with the words "Hazardous Waste", "Used Fuel & Oil Filters", "H. E. Maint", and "000639" (see Photograph #51). The drum appeared to be full. It was not marked with an accumulation start date. One closed-top metal 55-gallon drum (a satellite accumulation container holding waste oil / fuel) was staged in the garage. It was open (a plastic drain pan had been placed in the drum's bung hole) and labeled with the words "Hazardous Waste"; "Waste Oil, Diesel, Gasoline"; "H. E. Maint", and "000639" (see Photograph #52). Four intact used oil filters were being drained into the drum at the time of the inspection. One closed-top 55-gallon drum (a satellite accumulation container of waste antifreeze) was also located in Building 300. The drum was closed and labeled with the words "Hazardous Waste", "Spent Antifreeze", "H. E. Maint", and "000056" (see Photograph #53). Several empty used oil transfer containers (of various shapes and sizes) were staged in the shop (see Photograph #54 and Photograph #55). Each of these containers was labeled with the words "Used Oil".

Three metal tanks—two that held new oil and one that held used oil—were staged inside a secondary containment structure (a coated concrete pad surrounded by coated concrete berms) located outside Building 300 (see Photograph #56). The used oil storage tank (Tank 303) appeared to have a capacity of approximately 1,000 gallons. It was labeled with the words "Used Oil", "Non-Haz Waste", "EME-000033", and "Combustible".

H) Building 402 – Contractor Maintenance Shop (Satellite Accumulation Area)

Building 402 houses an additional maintenance shop—a 6-bay corrugated metal garage—that is used by third-party contractors to perform maintenance and repairs on contractor-owned / operated equipment. The contractor maintenance shop is currently operated by Robbie D. Wood, Inc. (ALD067138891).

Mr. Cogle and Mr. Burke escorted the inspectors to Building 402. One parts washer was located in the contractor maintenance shop. One open-top metal 55-gallon drum (a satellite accumulation container holding waste aerosol cans) was staged in the shop at the time of the inspection (see Photograph #57). The drum was closed and labeled with the words "Hazardous Waste", "Aerosol Cans" and "F001 – F005" (see Photograph #58). One metal 55-gallon drum containing used oil was also staged in the shop (see Photograph #59). It was closed and labeled with the words "Used Oil". Several empty used oil transfer containers (of various shapes and sizes) were staged in the shop. Each of these containers was labeled with the words "Used Oil". One roll-off container of scrap metal was staged outside of the shop. According to Mr. Burke, scrap metals generated in the shop are transported by Robbie D. Wood, Inc. to a local scrap metal recycler.

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The inspection participants returned the following day to continue the inspection. The following areas were inspected on November 19, 2015:

I) Building 700 – Container Management Area (Hazardous Waste Storage / Consolidation Unit)

Building 700 includes the following areas: a permitted hazardous waste container storage area (which occupies the majority of the building) and a hazardous waste consolidation area (which is located on the north side of the building). Containers of hazardous waste, used oil, universal waste, and PCB-contaminated wastes are stored for up to one year in the hazardous waste container storage area. In the hazardous waste consolidation area, containers of hazardous waste (such as 55-gallon drums) are bulked into larger containers (such as roll-off containers). The building is constructed of cinderblock and corrugated metal; it is equipped with an impervious stainless steel floor.

Mr. Coglin and Mr. West accompanied the inspectors to Building 700. Signs bearing the words “Entry Prohibited – All Personnel Must Enter and Exit Through Decon Zone”, “Danger – No Smoking”, and “Caution – Contains PCBs” were posted on the exterior of the building (see Photograph #60). Signs bearing the words “No Smoking”, “Decon Zone”, “Danger – Hard Hats, Ear and Eye Protection Required Beyond This Point”, “Visitors Must See Area Supervisor Before Entering”, and “Caution – Contains PCBs” were posted on the entrance to the building (see Photograph #61). Two open-top metal 55-gallon drums (satellite accumulation containers holding used PPE) were staged in the decon zone at the entrance / exit to Building 700. One of the drums held hazardous waste (PPE that had been contaminated with hazardous waste, according to Mr. Coglin). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the words “Hazardous Waste”; “D001, D002, D004, D005”; “Used PPE”; and “Caution – Contains PCBs” (see Photograph #62). The drum was dated August 25, 2015. The other drum held non-hazardous waste (PPE that had been used but that had not been contaminated with hazardous waste, according to Mr. Coglin). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the words “Non-Hazardous Waste”, “Non-Haz Solid”, and “Caution – Contains PCBs” (see Photograph #63). The drum was dated August 25, 2015.

The floor / secondary containment system within the container storage area appeared to be in good condition. Grated metal pits (blind sumps) were set into the floor at regular intervals. Containers of various shapes and sizes (metal 55-gallon drums, plastic 55-gallon drums, cardboard boxes, metal 5-gallon buckets, fiberboard drums, plastic 250-gallon totes, super sacks, etc.) were staged in the container storage area at the time of the inspection. Each container in this area was closed and labeled with the date it was received by CWM, the manifest number of the manifest that accompanied it, the applicable profile number, the generator’s name, and all applicable waste codes. Such labels were not visible on two damaged 250-gallon super sacks that had been repaired with opaque plastic sheeting (the plastic sheeting covered the labels on the super sacks). At the time of the inspection, Mr. West repositioned the labels so that they would be visible.

Mr. Sturdivant accompanied the inspectors to the hazardous waste consolidation area located on the north side of Building 700. The area consisted of a bermed concrete pad (an extension of the foundation of Building 700) that was covered by a corrugated metal roof. The concrete pad was coated with a chemical-resistant polymer, which appeared to be in good condition. Several open-top metal 55-gallon drums containing hazardous waste were stacked two-high in this area. Aisle space between the stacked drums did not appear adequate for the movement of forklifts or other vehicles (see Photograph #64 and Photograph #65). Twelve of these containers were not labeled with the date upon which CWM received the wastes (see Photograph #66).

J) Building 702 – Container Storage Area (Hazardous Waste Storage Unit)

Building 702 is connected to Building 700 via an enclosed conveyor system and is used as an additional storage area for containers of hazardous waste. The building is constructed of cinderblock and corrugated metal. It is constructed atop a concrete slab that has been coated with a chemical-resistant polymer.

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Mr. Coglein and Mr. West accompanied the inspectors to Building 702. Warning signs similar to the signs posted outside of Building 700 were posted on the exterior of Building 702. Warning signs similar to the signs posted on the entrance of Building 700 were posted on the entrance to Building 702. Two open-top metal 55-gallon drums (satellite accumulation containers holding used PPE) were staged in the decon zone at the entrance / exit to Building 702. One of the drums held hazardous waste (PPE that had been contaminated with hazardous waste). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the words "Hazardous Waste"; "D001, D002, D004, D005"; "Used PPE"; "Caution – Contains PCBs"; and "Drum Process" (see Photograph #67 and Photograph #68). The other drum held non-hazardous waste (PPE that had been used but that had not been contaminated with hazardous waste). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the words "Non-Hazardous Waste", "Non-Haz Solid", and "Caution – Contains PCBs". Both drums were dated August 25, 2015.

Containers of various shapes and sizes (metal 55-gallon drums, plastic 55-gallon drums, cardboard boxes, metal 5-gallon buckets, fiberboard drums, plastic 250-gallon totes, super sacks, etc.) were staged in Building 702 at the time of the inspection. Each container was closed and labeled with the date it was received by CWM, the manifest number of the manifest that accompanied it, the applicable profile number, the generator's name, and all applicable waste codes. One plastic-wrapped pallet of non-hazardous waste staged in a corner of the building had collapsed, releasing its contents onto the floor (see Photograph #69 through Photograph #71). A portion of the building is divided (via cinderblock walls) into a separate room (Mr. West referred to the room as the "mercaptan handling area"). A strong mercaptan aroma was present in the room. The chemical-resistant coating in the mercaptan handling area appeared to be damaged in several areas (see Photograph #72 through Photograph #77).

**K) Building 604 – Container Storage Area (Hazardous Waste Storage Unit)**

Building 604 houses a storage area for hazardous wastes and PCB-contaminated materials. The building's floor has been covered by an impervious sheet of stainless steel that acts as a secondary containment device.

Mr. Coglein and Mr. West accompanied the inspectors to Building 604. Two open-top metal 55-gallon drums (satellite accumulation containers holding used PPE) were staged in the decon zone at the entrance / exit to Building 604. One of the drums held hazardous waste (PPE that had been contaminated with hazardous waste). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the words "Hazardous Waste"; "D001, D002, D004, D005"; "Used PPE"; "Caution – Contains PCBs"; and "Drum Process" (see Photograph #78). The other drum held non-hazardous waste (PPE that had been used but that had not been contaminated with hazardous waste). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the words "Non-Hazardous Waste", "Non-Haz Solid", and "Caution – Contains PCBs". Both drums were dated August 25, 2015.

The floor / secondary containment system within Building 604 appeared to be in good condition. Metal 55-gallon drums containing water-reactive hazardous wastes were staged in this area. The drums were covered with plastic sheeting to minimize their contact with water (see Photograph #79 and Photograph #80). Each drum was closed and labeled with the date it was received by CWM, the manifest number of the manifest that accompanied it, the applicable profile number, the generator's name, and all applicable waste codes (the labels were not visible because they were covered with plastic sheeting; Mr. West removed the plastic sheeting so that the labels could be inspected). Two open-top metal 55-gallon drums containing fluids used to clean PCB-contaminated sampling equipment were staged in a corner of the building. One of the drums held wash water and one of the drums held rinse water. Both drums were labeled with the words "Hazardous Waste", "Caution – Contains PCBs", and an accumulation start date of November 9, 2015 (see Photograph #81 and Photograph #82). According to Mr. West, neither of these containers held wastes (the wash water and rinse water in the drums are still in use).

**L) Building 600 – Container Storage Area (Hazardous Waste Storage Unit)**



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Building 600—a split-level corrugated metal building with a concrete floor—is a storage area for hazardous wastes and PCB-contaminated materials. The building's floor has been coated with a chemical-resistant polymer, which acts as a secondary containment device. A tank farm consisting of the following tanks is located on the lower floor: Tank 634 (a storage tank for PCB-bearing oils), Tank 635 (a storage tank for PCB-bearing oils), and Tank 636 (a storage tank for unused mineral oil, which is used as a flush solution for cleaning PCB-contaminated materials). An organic waste pumping station (which is used to transfer organic wastes into tanker trucks) is located on the upper floor.

Mr. Cogle and Mr. West escorted the inspectors to Building 600. The floor / secondary containment system within Building 600 appeared to be in good condition. Metal 55-gallon drums containing water-reactive hazardous wastes were staged on the lower floor. The drums were covered with plastic sheeting to minimize their contact with water (see Photograph #83). Each drum was closed and labeled with the date it was received by CWM, the manifest number of the manifest that accompanied it, the applicable profile number, the generator's name, and all applicable waste codes (the labels were not visible because they were covered with plastic sheeting; Mr. West removed the plastic sheeting so that the labels could be inspected). Three tanks were staged on the lower floor of Building 600. Tank 634 and Tank 635 (PCB storage tanks) were labeled with the words "Caution – Contains PCBs". Tank 636 (a storage tank for unused mineral oil) was labeled with the words "Clean Flush".

An organic waste pumping station was located on the upper floor of Building 600 (see Photograph #84). The pumping station was suspended over a grated metal catch basin, which provided additional secondary containment. The catch basin was labeled with the words "Caution – Contains PCBs". The pipes leading to / from the pumping station were labeled with the words "In PCB Service" (see Photograph #85). Equipment associated with the pumping station (pipe joints, flanges, valves, etc.) comes into contact with organic hazardous wastes and is, therefore, subject to Subpart BB tagging requirements. A legible tag was affixed to each piece of equipment connected to the pumping station (see Photograph #86 and Photograph #87).

A loading / unloading area is located between the upper level and the lower level of Building 600. The floor of this area consists of a concrete pad that has been coated with a chemical-resistant polymer. Two strips of steel had been bolted into the concrete in this area, possibly compromising the integrity of the chemical-resistant coating (see Photograph #88).

#### M) Building 520 – Tank Management Unit (Hazardous Waste Storage Unit)

Building 520 consists of a 200,000-gallon hazardous waste storage tank (Tank 520) and two separate staging areas for tankers and / or roll-off containers. The tank is surrounded by a concrete secondary containment system (a concrete base surrounded by four-foot-high concrete walls) that is coated with a chemical-resistant polymer. Both container staging areas (which consist of corrugated metal roofs suspended over bermed concrete pads) have a maximum capacity of two tankers / roll-off containers. Both the concrete pads and the concrete berms are coated in a chemical-resistant polymer.

Mr. Cogle and Mr. West accompanied the inspectors to Building 520. Signs bearing the words "Danger – Flammable Liquids – No Smoking" were posted around Tank 520. The tank was labeled with the words "Hazardous Waste" (see Photograph #89). The secondary containment structure surrounding the tank appeared to be in good condition (no cracks or gaps in the chemical-resistant coating were noted). Tank 520 is used to store organic hazardous wastes. Equipment associated with the tank, therefore, is subject to Subpart BB tagging requirements. Tags affixed to equipment (joints, flanges, valves, etc.) connected to Tank 520 had been painted over and were not legible (see Photograph #90 through Photograph #101). According to Mr. West, the tank was empty at the time of the inspection.

Two tanker trucks were parked in one of the staging areas. One of the tankers contained unused fuel. The other contained hazardous waste; it was labeled with the words "Hazardous Waste", "Drum Process PCB Barn", and "F001 F002 F003 F004 F005" (see Photograph #102). The tanker was marked with an accumulation start date of November 2, 2015. Two roll-off containers of stabilized wastes were parked in

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the other staging area.

**N) Building 603 – Container Storage Area (Hazardous Waste Storage Unit)**

Building 603 is divided into three areas. Various hazardous wastes are stored in the eastern portion of the building. Universal wastes are stored in the central portion of the building. Mercury wastes are stored in the western portion of the building. Building 603 is constructed of corrugated metal and has a coated concrete floor.

Mr. Coglin and Mr. West accompanied the inspectors to Building 603. Two open-top metal 55-gallon drums (satellite accumulation containers holding used PPE) were staged in the decon zone at the entrance / exit to Building 603. One of the drums held hazardous waste (PPE that had been contaminated with hazardous waste). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the words "Hazardous Waste"; "D001, D002, D004, D005"; "Used PPE"; and "Caution – Contains PCBs". The drum was dated August 25, 2015. The other drum held non-hazardous waste (PPE that had been used but that had not been contaminated with hazardous waste). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the words "Non-Hazardous Waste", "Non-Haz Solid", and "Caution – Contains PCBs". The drum was dated August 25, 2015.

The floor / secondary containment system within Building 603 appeared to be in good condition. Grated metal pits (blind sumps) were set into the floor at regular intervals. Containers of various shapes and sizes (metal 55-gallon drums, plastic 55-gallon drums, cardboard boxes, metal 5-gallon buckets, fiberboard drums, etc.) were staged in the eastern and central portions of Building 603. Each container in this area was closed and labeled with the date it was received by CWM, the manifest number of the manifest that accompanied it, the applicable profile number, the generator's name, and all applicable waste codes. Metal 5-gallon containers of waste mercury were staged in the western portion of the building (see Photograph #103 and Photograph #104). Many of these containers had been stored on-site for greater than one year.

**O) Building 406 – Bulk Container Storage Area (Hazardous Waste Storage Unit)**

Building 406 consists of a corrugated metal roof suspended over a gravel lot. The north side of Building 406 is used as a storage area for clean equipment and empty containers. The south side of the building is a permitted storage area for bulk containers of hazardous waste. The portion of the building in which hazardous waste are stored is equipped with a secondary containment structure (a coated concrete pad surrounded by coated concrete berms). The hazardous waste storage area has a maximum capacity of fifteen roll-off containers.

Mr. Coglin escorted the inspectors to Building 406. Signs bearing the words "Danger – No Smoking" and "South End of Building 406 – Permitted Storage – Solid Storage Only – No Liquids" were posted near the southern portion of the building (see Photograph #105). The floor of this area consisted of a concrete pad that has been coated with a chemical-resistant polymer. Several strips of steel had been bolted into the concrete pad (see Photograph #106). Rainwater had accumulated in the secondary containment structure (see Photograph #107). Fourteen roll-off containers of hazardous waste and one hydraulic compactor were staged in the southern portion of the building at the time of the inspection. Each of the containers was closed / covered and labeled with the words "Hazardous Waste", the applicable waste code(s), and an accumulation start date. One of the containers (container #RO76\*10) was labeled with an accumulation start date of September 25, 2010 (see Photograph #108). Mr. Coglin provided the inspectors with documentation that the container should have been marked with a date of September 25, 2015. A new label—marked with the appropriate accumulation start date—was placed on the container at the time of the inspection.

**P) Building 703-A – Container Storage Area (Hazardous Waste Storage Unit)**

Building 703-A consists of a corrugated metal roof suspended over a bermed concrete pad. The pad and

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the berms are coated in a chemical-resistant polymer. The building has a maximum capacity of three roll-off containers.

Mr. Coglin accompanied the inspectors to Building 703-A. The floor / secondary containment system appeared to be in good condition. Two roll-off containers of waste were staged in this area at the time of the inspection (see Photograph #109 and Photograph #110). One of the containers held non-hazardous waste; the other container held hazardous waste. The container of hazardous waste was closed / covered and labeled with the words "Hazardous Waste", the applicable waste code(s), and an accumulation start date.

Q) Building 1700 – Leachate Storage Tanks (Hazardous Waste Storage Unit)

Building 1700 is a corrugated metal building that houses two double-walled leachate storage tanks (Tank 1701 and Tank 1702). Both tanks have a capacity of approximately 30,000 gallons. The building's concrete floor (which is coated with a chemical-resistant polymer) provides additional secondary containment for the tanks.

Mr. Speight accompanied the inspectors to Building 1700. Both tanks in building 1700 were labeled with the words "Hazardous Waste" (see Photograph #111 and Photograph #112). Grated metal pits (blind sumps) were set into the floor. Support columns for the pipes leading to and from the tanks had been bolted into the concrete floor (see Photograph #113).

R) Building 1703 – Leachate Storage Tanks (Hazardous Waste Storage Unit)

Building 1703 is a corrugated metal building that houses two double-walled leachate storage tanks (Tank 1703 and Tank 1704). Both tanks have a capacity of approximately 30,000 gallons. The building's concrete floor (which is coated with a chemical-resistant polymer) provides additional secondary containment for the tanks.

Mr. Speight accompanied the inspectors to Building 1703. Both tanks in building 1703 were labeled with the words "Hazardous Waste" (see Photograph #114 and Photograph #115). Grated metal pits (blind sumps) were set into the floor. Support columns for the pipes leading to and from the tanks had been bolted into the concrete floor. Tank 1703 was empty at the time of the inspection.

S) Closed Landfills (Units Undergoing Post-Closure Care)

The following closed hazardous waste landfills are currently undergoing post-closure care at the site: Trenches 8, 9, 10, 11, 12, 12A, 13, 13A, 14, 15, 16, 17, 18, 19, 20, and 21. All sixteen of these landfills have been capped and covered with a layer of live vegetation. CWM's groundwater monitoring program currently consists of 58 wells.

Mr. Speight accompanied the inspectors on a tour of CWM's closed landfills and the associated groundwater monitoring system. Signs bearing the words "Caution – Closed Hazardous Waste Landfill – Minimize Actions Affecting Closure Liner Integrity" were posted around the perimeter of each closed landfill (see Photograph #116). The caps / vegetative covers of all sixteen landfills appeared to be in good condition. No stressed vegetation, ponding, or evidence of erosion was noted. A line of utility poles were set into the ground between the border of Trench 10 and the border of Trench 11 (see Photograph #117). These utility poles did not appear to penetrate the caps of either landfill.

The following groundwater monitoring wells were observed at the time of the inspection: Wells CMI-2, M-58, M-65, PM-17, SM-02, SM-11, SM-05, SM-05A, SM-05B, SM-05C, SM-05D, SM-05E, SM-07, SM-07A, SM-10, SM-10A, SM-14, SM-14A, SM-15, and SM-36. The concrete apron surrounding Well PM-17 was damaged and in need of repair (see Photograph #118 through Photograph #120). All other groundwater monitoring wells observed at the time of the inspection appeared to be in good condition. The casing of each well was locked and clearly labeled with an identifying number (see Photograph #121 through Photograph #123). One open-top metal 55-gallon drum was staged on the ground near Well SM-

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05 (see Photograph #124). The drum was closed and unlabeled. Mr. Speight stated that the drum contained purge water generated during a sampling event that occurred approximately one week prior to the inspection. According to CWM personnel, purge water generated on-site is managed as hazardous waste.

T) Building 900 – Wheel Wash Station

Building 900 is a wheel wash station. In order to prevent possible environmental contamination, vehicles / equipment (such as trucks and excavators) that operate in the active landfill are washed at Building 900 prior to exiting the landfill. The building (a corrugated metal structure constructed atop a concrete pad) includes a manual wash bay, an automatic wash bay, a wash water filtration system, and two wash water storage tanks. Wash water generated in this area is collected in grated sumps in the building's floor, filtered, and subsequently reused as wash water. When used wash water becomes too dirty to recycle / reuse, it is pumped directly into Tank 1418 (which is located in CWM's tank farm) and subsequently used as makeup water in CWM's stabilization process (in Building 1200-A).

Mr. Sturdivant and Mr. Jones accompanied the inspectors to Building 900. Signs bearing the words "Authorized Personnel Only" and "Notice – Hot Zone – Contact Supervisor or Operator Before Entering Area" were posted on the exterior walls of the building. One open-top metal 55-gallon drum (a satellite accumulation container holding contaminated PPE) was staged outside the building (see Photograph #125). The drum was closed (it was equipped with a domed metal lid with a spring-loaded opening) and labeled with the following words: "PPE Only", "Caution – Contains PCBs", "Hazardous Waste", "Site Generated PPE / Debris", "000684", and "D004-11".

Two 2,000-gallon wash water storage tanks (Tank 901 and Tank 902) were located inside Building 900. Both tanks were labeled with the words "Hazardous Waste", "F039", and "Non-Potable Water". All pipes connected to the two tanks were labeled with the words "Non-Potable Water". According to Mr. Nelson, Tank 901 contained used wash water and Tank 902 contained clean (unused) wash water. Neither tank contained waste, according to Mr. Nelson. One roll-off container (container #WW-01") was connected to the wash water filtration system and staged next to the two tanks (see Photograph #126). According to Mr. Nelson, the container held solids generated in the wash water filtration system. The container was closed / covered and labeled with the words "Hazardous Waste", "F039", and "Non-Potable Water".

The inspection participants returned the following day to continue the inspection. The following areas were inspected on November 20, 2015:

U) Building 2000 – Biological Treatment Unit (Hazardous Waste Treatment Unit)

Building 2000 is a concrete-floored corrugated metal building that houses CWM's biological treatment unit—a wastewater treatment plant in which leachate removed from Trench 22 is treated. The biological treatment unit is a NPDES-permitted zero-discharge unit. It consists of a chemical pretreatment process (wherein chemical reactions are used to remove contaminants from waste water) and a biological treatment process (wherein microorganisms are used to remove contaminants from waste water). Sludge generated in the unit is managed as hazardous waste (F039). Treated water removed from the biological treatment unit is used as a dust suppressant in Trench 22.

Mr. Sturdivant escorted the inspectors to Building 2000. Due to the presence of ammonia gas, inspectors were not able to enter the building at the time of the inspection. Inspectors viewed the interior of the building from a balcony overlooking the biological treatment unit (see Photograph #127 and Photograph #128). One of the building's walls appeared to be damaged. One roll-off container of waste water treatment sludge (F039) was staged underneath a filter press within Building 2000 (see Photograph #129). The container appeared to be unlabeled (no markings were visible from the inspectors' vantage point).

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V) Building 1000 – Bulk Sampling Station

Building 1000 is a corrugated metal building where bulk shipments of waste (roll-off containers, tractor trailers, etc.) are sampled—in accordance with CWM’s confirmatory sampling procedure—prior to being accepted by CWM. Transport vehicles carrying bulk wastes destined for disposal at the facility pass underneath a metal scaffold within the building; and CWM employees stationed on the scaffolding obtain grab samples of the wastes. Building 1000 is connected to Building 1001, which houses a break room / lounge for truck drivers. Building 1002—a corrugated metal building that houses an additional sampling station—is connected to the opposite side of Building 1001. The three buildings are surrounded by a gravel lot, where containers are temporarily staged before and / or after samples are taken. Up to 70 trucks / containers may be parked in the lot at any given time.

Mr. Coglin accompanied the inspectors to the parking area surrounding Building 1000. Nine trucks and two roll-offs containers were parked in the gravel lot at the time of the inspection.

Two open-top metal 55-gallon drums containing fluids used to clean sampling equipment were staged underneath the scaffolding in Building 1001. Both drums were staged within plastic secondary containment barrels. One of the drums held wash water. It was closed and labeled with the words “Hazardous Waste”, “Wash”, and “Profile #000701” (see Photograph #130 and Photograph #131). It was marked with an accumulation start date of November 8, 2015. The other drum held rinse water. It was closed and labeled with the words “Hazardous Waste”, “Rinse”, and “Profile #000702” (see Photograph #132 and Photograph #133). It was marked with an accumulation start date of November 8, 2015. According to Mr. Coglin, neither of these containers held wastes (the wash water and rinse water in the drums are still in use).

Signs bearing the words “Notice – Hot Zone – Contact Supervisor or Operator Before Entering Area” were staged around the scaffolding in Building 1002 (see Photograph #134). One open-top metal 55-gallon drum containing clean sampling equipment was staged on the scaffolding in Building 1002 (see Photograph #135). The drum was open and lined with plastic. It was labeled with the words “Clean Equip” and “Caution – Contains PCBs” (see Photograph #136). One open-top metal 55-gallon drum containing used sampling equipment was also staged on the scaffolding in Building 1002 (see Photograph #137). The drum was open and lined with plastic. It was labeled with the words “Used Equip” and “Caution – Contains PCBs” (see Photograph #138). According to Mr. Coglin, neither of these containers held wastes.

W) Perimeter Fence

CWM’s facility is surrounded by a chain-link perimeter fence designed to prevent unknowing / unauthorized access of people and livestock to the active portion of the facility.

Mr. Speight accompanied the inspectors on a tour of the facility’s perimeter fence. Trees growing adjacent to the fence at CWM’s western end had not been cut back, undermining the effectiveness of the barrier. A portion of the fence at CWM’s southern end had been undercut by erosion, creating a possible means of ingress through the barrier.

A review of CWM’s waste management records was performed concurrently with the on-site inspection. The following documents were reviewed at that time: incoming manifests (for wastes accepted by CWM), outbound manifests (for wastes shipped off-site by CWM), records of inspections of CWM’s hazardous waste storage areas, records of inspections of CWM’s hazardous waste storage tanks, process logs for the stabilization unit, inspection and maintenance logs for units subject to Subpart BB and Subpart CC, bulk container transfer logs, tank integrity tests, burial coordinate logs, closure / post-closure plans, financial assurance documents, the facility’s contingency plan, records of hazardous waste management training provided to CWM’s employees, job titles / descriptions for

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employees that manage hazardous waste, CWM's waste analysis plan, CWM's SPCC plan, work orders for maintenance on all hazardous waste management units at the site, and selected waste profiles. The inspectors' review and evaluation of these documents showed the following:

- A work order (work order #04919) for repairs to the walls in a portion of Building 1200-A was initiated on March 26, 2014 and completed on June 11, 2014; however, records of weekly and daily inspections performed within Building 1200-A during that time period did not include documentation of the damage or the ongoing repairs;
- CWM's contingency plan did not include the locations of fire extinguishers located at the site (Mr. Kronable stated that the contingency plan is currently being updated and that the updated plan will include the locations of the facility's fire extinguishers);
- The manifest for an outbound shipment of hazardous waste (manifest #002917298 GBF) was dated October 2, 2015 but was not shipped off-site until October 12, 2015;
- The manifest for an outbound shipment of hazardous waste (manifest #002235229 GBF) was dated January 28, 2014 but was not shipped off-site until February 12, 2014;
- Review of waste profile #AL401329 indicated that the waste's physical characteristics changed from "non-wastewater" to "wastewater"; the Department was not notified of this change; and
- The appropriate waste codes were not noted in waste profile #AL184676; instead, a notation of "codes as manifested" was placed in the profile (this notation was not approved by the Department's waste preapprovals program).

#### 10) SUMMARY

Based on the observations made during the inspection, CWM appears to be a treatment, storage, and disposal facility; a large quantity generator of hazardous waste; a used oil generator; a transporter of hazardous waste, used oil, and universal waste; and a large quantity handler of universal waste. The following areas of concern were noted at the time of the inspection:

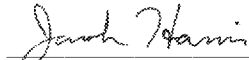
- Deterioration of the chemical-resistant coating on the secondary containment system in CWM's tank farm was noted (work order #04944 was initiated on October 13, 2015 to address this issue) (see Attachment B);
- A satellite accumulation container with a total capacity of 55-gallons staged near Building 1400 was full and had not been marked with an accumulation start date;
- One roll-off container in Building 2200 (container #RO-24) was not dated;
- The labels on two roll-off containers in Building 2200 (container #6014 and container #965) were not visible for inspection;
- A satellite accumulation container with a total capacity of 55-gallons in Building 300 was full and had not been marked with an accumulation start date;
- The labels on two super sacks staged in Building 700 were covered with opaque plastic and were not visible for inspection (this area of concern was corrected at the time of the inspection);
- Aisle space between containers staged in the north side of Building 700 did not appear adequate for the movement of forklifts;
- Twelve 55-gallon drums staged in the north side of Building 700 were not dated;
- Deterioration of the chemical-resistant coating on the floor of Building 702 was noted;
- The labels on containers in Building 604 were covered with opaque plastic and were not visible for inspection (this area of concern was addressed at the time of the inspection);

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- The labels on containers in Building 600 were covered with opaque plastic and were not visible for inspection (this area of concern was addressed at the time of the inspection);
- Two metal plates had been bolted to the floor of the loading / unloading area in Building 600, potentially compromising the integrity of the chemical-resistant coating in that area;
- Subpart BB tags on equipment connected to Tank 520 were not legible (the tank was empty at the time of the inspection);
- Containers of waste mercury staged in Building 603 have been stored on-site for greater than one year;
- A roll-off container (container #RO76\*10) in Building 406 was marked with an incorrect date (this area of concern was corrected at the time of the inspection);
- The concrete apron around the casing of Well PM-17 was damaged;
- One 55-gallon drum of purge water staged outside near Well SM-05 was not labeled;
- One wall of Building 2000 appeared to be damaged; no work order had been initiated to address the damage;
- The label on a roll-off container of sludge in Building 2000 was not visible for inspection;
- Sections of the perimeter fence on the western and southern sides of the facility were compromised;
- Records of weekly and daily inspections performed within Building 1200-A did not include documentation of an ongoing work order to repair damage to the building (see Attachment C);
- CWM's contingency plan did not include the locations of fire extinguishers at the site;
- The dates of origination on two manifests (manifest #002917298 GBF and manifest #002235229 GBF) did not match the dates on which the wastes were shipped off-site (see Attachment D and Attachment E);
- CWM did not notify the Department of changes to waste profile #AL401329; and
- The appropriate waste codes were not noted in waste profile #AL184676.

At the conclusion of the inspection, the inspectors held a closing conference with representatives of CWM (Mr. Davis, Mr. Kronable, Mr. Sturdivant, Mr. Talbot, Mr. Coglein, and Ms. Acker). During the meeting, the inspectors reviewed and discussed their observations, presented their findings to CWM's representatives, and provided CWM's representatives with an opportunity to ask questions. At the conclusion of the closing conference, Mr. Harris prepared a *Preliminary Inspection Report* describing the above areas of concern. Mr. Davis accepted the report on behalf of CWM. The inspectors concluded the closing conference and departed the site at approximately 3:15 p.m. on November 20, 2015.

11) SIGNED



Compliance and Enforcement Section  
Industrial Hazardous Waste Branch  
Land Division

December 22, 2015

Date

12) CONCURRENCE

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Clethes Stallworth, Chief  
Compliance and Enforcement Section  
Industrial Hazardous Waste Branch  
Land Division

**December 22, 2015**

Date

Attachments: A) Photographs of the Installation  
B) Work Order #04944  
C) Work Order #04919 and Inspection Logs for Building 1200-A  
D) Manifest #002917298 GBF  
E) Manifest #002235229 GBF

File: 02796 ALD000622464 119 20151222 HWTM Inspection Report



**ATTACHMENT A:**  
**PHOTOGRAPHS OF THE INSTALLATION**



**ATTACHMENT B:**  
**WORK ORDER #04944**

**ATTACHMENT C:**  
**WORK ORDER #04919 AND**  
**INSPECTION LOGS FOR BUILDING 1200-A**

**ATTACHMENT D:**  
**MANIFEST #002917298 GBF**

**ATTACHMENT E:**  
**MANIFEST #002235229 GBF**